

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

Paul R. DeFilippo, Esq.  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
Facsimile: (212) 382-0050  
pdefilippo@wmd-law.com

**JONES DAY**

Gregory M. Gordon, Esq.  
Brad B. Erens, Esq.  
Dan B. Prieto, Esq.  
Amanda Rush, Esq.  
2727 N. Harwood Street  
Dallas, Texas 75201  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100  
gmgordon@jonesday.com  
bberens@jonesday.com  
dbprieto@jonesday.com  
asrush@jonesday.com  
(Admitted *pro hac vice*)

**ATTORNEYS FOR DEBTOR**

In re:

LTL MANAGEMENT LLC,<sup>1</sup>  
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**Objection Deadline:** July 26, 2023

**Hearing Date and Time:**  
August 2, 2023 at 10:00 a.m.

**NOTICE OF DEBTOR'S MOTION FOR ENTRY  
OF AN ORDER EXTENDING THE PERIOD WITHIN WHICH THE  
DEBTOR MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452  
AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

**PLEASE TAKE NOTICE** that, on August 2, 2023 at 10:00 a.m., or as soon thereafter as counsel may be heard, LTL Management LLC, the above-captioned debtor (the “Debtor”), by and through its counsel, shall move before the Honorable Michael B. Kaplan,

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order, pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure, extending the period within which the Debtor may remove actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 through and including December 29, 2023 (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to D.N.J. LBR 9013-2 and the *Order Establishing Case Management and Administrative Procedures* [Dkt. 554], responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s undersigned counsel, (b) counsel to the Debtor’s non-debtor affiliates, Johnson & Johnson Holdco (NA) and Johnson & Johnson, (c) counsel to the Official Committee of Talc Claimants, (d) the Future Claimants’ Representative and her counsel, (e) counsel to the Ad Hoc Committee of Supporting Counsel, (f) the Office of the United States Trustee for the District of New Jersey and (g) any other party entitled to notice no later than seven (7) days prior to the hearing.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the requested relief may be granted without a hearing.

Dated: July 3, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

Paul R. DeFilippo, Esq.  
James N. Lawlor, Esq.  
Joseph F. Pacelli, Esq. (*pro hac vice*)  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
Facsimile: (212) 382-0050  
pdefilippo@wmd-law.com  
jlawlor@wmd-law.com  
jpacelli@wmd-law.com

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Dallas, Texas 75201  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100  
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dbprieto@jonesday.com  
asrush@jonesday.com  
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